

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

TARIK CHAMBERS

Case No. 22-504-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 19, 2021 in the county of Delaware in the
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 2119

Carjacking

18 U.S.C. 924(c)(1)(A)(ii)

Brandishing a Firearm During and in Relation to a Crime of Violence

18 U.S.C. 2

Aiding and abetting

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

/s/ Ryan Rooney

Complainant's signature

Ryan Rooney, Special Agent, ATF

Printed name and title

Sworn to before me and signed in my presence.

3/25/2022

Date: _____

/s/ Timothy R. Rice

*Judge's signature*City and state: Philadelphia, PA

Hon. Timothy R. Rice, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

NIKEEM LEACH-HILTON

Case No. 22-504-2

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 19, 2021 in the county of Delaware in the
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 2119

18 U.S.C. 924(c)(1)(A)(ii)

18 U.S.C. 2

Carjacking

Brandishing a Firearm During and in Relation to a Crime of Violence

Aiding and abetting

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

/s/ Ryan Rooney

Complainant's signature

Ryan Rooney, Special Agent, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/25/2022

/s/ Timothy R. Rice

*Judge's signature*City and state: Philadelphia, PA

Hon. Timothy R. Rice, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Ryan Rooney, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), and have been so employed since March 2014. I am currently assigned to ATF Philadelphia Group VII, which is a Firearms Enforcement Group whose primary responsibilities include investigating violent crime through the illegal use, possession, and sale of firearms. As a result of my training and experience, and that of other investigators, I have conducted numerous investigations involving violations of federal firearms and narcotics laws, as well as violations of laws relating to federal violent crimes such as carjacking. I am familiar with federal search warrants and seizing evidence in accordance with the probable cause set forth in the affidavits. I have authored and executed federal search warrants in the past and have provided affidavits at the state and federal level in support of similar search warrants.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

3. This affidavit is being submitted in support of a criminal complaints and arrest warrants charging TARIK CHAMBERS and NIKEEM LEACH-HILTON with carjacking, in violation of Title 18, United States Code, Section 2119, brandishing a firearm during and in relation to a crime of violence in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii), and aiding and abetting, in violation of Title 18, United States Code, Section 2.

4. On December 19, 2021, at approximately 9:17 a.m., Springfield Township Police Department (“Springfield PD”) Officers received a call for an armed carjacking in the parking lot of a furniture store, located at 65 Baltimore Pike, in Springfield, Delaware County, Pennsylvania. When officers arrived, they interviewed the victim of the carjacking, D.E., and he stated that he was pulling into a parking space in the rear of the store in his gray 2004 Range Rover sport utility vehicle (SUV), bearing Pennsylvania license plate number GNK-2176.¹ As D.E. got out of his car, he noticed a gray Dodge Durango SUV with tinted windows pull into another parking space in the rear of the store. D.E. then stated that a black male wearing a ski mask, sweatpants, and a black hoodie² stepped out of the Dodge Durango, approached him, and displayed a black handgun with an extended magazine. The male pointed the gun at D.E., said that he was taking the victim’s car, and told the victim to place the keys to his Range Rover on the hood of the vehicle, or he would shoot the victim. D.E. complied. The male then entered the victim’s Range Rover and drove out of the parking lot, and the Dodge Durango drove away along with the Range Rover. These two vehicles were last seen by the victim heading northbound on Bishop Avenue. Springfield PD put out a BOLO (“be on the lookout”) for the gray Dodge Durango and the victim’s gray Range Rover.

5. At approximately 9:35 a.m., an eyewitness called 911 and reported observing a black male jump out of a gray Range Rover with Pennsylvania license plate number GNK-2176

¹ When Springfield PD ran the license plate GNK-2176 through their law enforcement system, the registration came back to a dead tag. The victim explained that he had recently purchased the Range Rover directly from someone else.

² When D.E. initially called 911 immediately after the carjacking, he described the male who pointed the gun at him as wearing a denim/sweatshirt-material jacket and could not say the color of the pants. When D.E. was interviewed by ATF on December 30, 2021, D.E. recalled that this male was wearing a black ski mask, gray sweatpants, and a black hoodie.

(that is, D.E.'s stolen Range Rover), and get into a gray Dodge Durango with tinted windows and with a Pennsylvania license plate at the intersection of MacDade Boulevard and Main Street. She then saw the Durango drive away. The gray Range Rover was left behind in the middle of the intersection at MacDade Boulevard and Main Street. I know this is about three miles from the scene of the carjacking described above.

6. The Darby Borough Police was dispatched for the report of a suspicious, possibly abandoned Range Rover at MacDade Boulevard and Main Street. Police responded and recovered the gray Range Rover bearing PA license plate number GNK-2176 that was stolen from D.E. in the carjacking. The Range Rover had been abandoned in the middle of the intersection of MacDade and Main Street.

7. Within minutes, an Aldan Borough Police Officer, who was responding to the report of the abandoned Range Rover, spotted a gray Dodge Durango bearing Pennsylvania tag LLD-5283,³ that matched the description of the Durango used to carjack D.E. The officer began to pursue the Dodge Durango along with another officer from the Darby Township Police Department. The Dodge Durango drove away from the officers at a high rate of speed. The Durango was observed driving through a red light and swerving into oncoming traffic. Then, at approximately 9:45 a.m., the Durango rear-ended another vehicle—a blue Chevrolet Equinox—forcing that vehicle into a utility pole, near the 500 block of Calcon Hook Road. The driver of the blue Chevrolet Equinox vehicle was taken to the hospital with severe injuries, including a broken hip, leg and right arm, and brain bleeding and swelling. The driver was in critical

³ The gray Dodge Durango bearing Pennsylvania tag LLD-5283 had been reported stolen in a carjacking about seven hours prior, around 2:50 a.m., in North Philadelphia.

condition at the hospital, spent weeks in the trauma ward, and has yet to recover from her life-threatening injuries.

8. After striking the blue Chevrolet Equinox, the two occupants of the Dodge Durango jumped out of the car and fled on foot. Officers observed that the driver of the Durango was wearing a black hoodie and gray-colored sweatpants, and the passenger was a black male wearing a navy bubble jacket and gray-colored sweatpants. Officers observed the two males jump over a fence and run into the industrial park. After a brief foot chase, NIKEEM LEACH-HILTON (who was driving the Durango as it fled from police) was arrested near 103 Henderson Drive, which is at the intersection of Calcon Hook Road and Henderson Drive. Several minutes later, and after a longer foot chase, officers arrested TARIK CHAMBERS (who was the passenger in the Durango as it fled from police).

9. As soon as LEACH-HILTON and CHAMBERS were in custody, D.E. was brought to the scene and positively identified Nikeem LEACH-HILTON as the black male who pointed the gun at him and stole his Ranger Rover. The victim was unable to identify CHAMBERS as the male driving the Dodge Durango because the victim did not get a good look at the driver during the carjacking.

10. Officers went back to the scene of CHAMBERS' arrest—near 103 Henderson Drive, which is about a block away from where the defendants crashed their car—and recovered a firearm in the bushes. Officers recovered a Polymer 80 (commonly referred to as a privately made firearm or a “ghost gun”), 9mm firearm⁴ containing an extended magazine. The magazine

⁴ A detective conducted an operability check and determined the 9mm firearm was operable.

had a 31-count capacity and contained 17 rounds of 9mm ammunition, as well as one round in the chamber of the firearm. The firearm had a green dot laser attached to the barrel.

11. When officers arrested LEACH-HILTON and CHAMBERS, they both had cell phones in their possession. On January 25, 2022, the Honorable Richard A. Lloret authorized a warrant to search the cell phones recovered from LEACH-HILTON and CHAMBERS. *See* Mag. No. 22-mj-115.

12. CHAMBERS' cell phone is associated with Apple ID tarikchambers84@icloud.com.⁵ CHAMBERS' cell phone included communications between LEACH-HILTON and CHAMBERS leading up to and around the time of the above-referenced carjacking in Springfield Township. At approximately 7:40 a.m. (about 1.5 hours before the Springfield Township carjacking), LEACH-HILTON messaged CHAMBERS, "Stay up bro I'm comin," to which CHAMBERS responded, "How far." Then, LEACH-HILTON said, "16 mins Bro this is for the cheese stay up." I know, based on my training and experience, that "cheese" refers to money. CHAMBERS replied, "I'm not going 2 sleep."

13. Agents also identified a video saved on CHAMBERS' phone taken on December 19, 2021 at approximately 9:36 a.m. that showed a gray Range Rover parked in the middle of the intersection at MacDade Boulevard and Main Street with its hazard lights flashing. In the video, two males can be heard talking, and one male asks another person (likely on a cell phone) "yo where you at bro?" The video camera is zooming in and out on the gray Range Rover. This is the exact same location and time at which the eyewitness described above saw a black male jump

⁵ CHAMBERS' cell phone was found without a SIM card inside. CHAMBERS had been using his iCloud account to send and receive messages on his device.

out of D.E.'s gray Range Rover and into the gray Dodge Durango (*see* Paragraph 5). Thus, I believe this video depicts CHAMBERS recording D.E.'s Range Rover.

14. Agents also found text messages and images on CHAMBERS' cell phone pertaining to his possible possession of a ghost gun. As explained above, the gun that police found after the carjacking was a ghost gun with a green laser and extended magazine. On July 21, 2021, an individual saved as "Rim" in CHAMBERS' cell phone said to CHAMBERS, "I'm tryn buy dat ghost off Yu how much Yu want Idm da price." CHAMBERS asked, "Why tf would I sell my gat [?] Fuck imma have [?]" to which Rim responded with a picture of a Taurus 9 handgun. CHAMBERS responded, "Naw." I know that "gat" refers to a gun. CHAMBERS' cell phone also contained a series of photos taken on December 17, 2021 of CHAMBERS and other individuals posing with numerous guns including what appear to be a black AR-style rifle, a black shotgun, a black semiautomatic handgun with a purple laser, another black semiautomatic handgun, and a black semiautomatic handgun with an extended magazine and a green laser. As explained above, the recovered ghost gun was a black semiautomatic handgun with an extended magazine with a green laser.

15. I also obtained cell site data for LEACH-HILTON's cell phone pursuant to a warrant. According to the cell site data, LEACH-HILTON was at the location of the Springfield Township carjacking at around the time of the carjacking. I know that neither LEACH-HILTON nor CHAMBERS live in this location.

16. I obtained a certificate from the National Insurance Crime Bureau confirming that the stolen Range Rover was manufactured in the United Kingdom, shipped to Annapolis, Maryland, then found in the Eastern District of Pennsylvania. Thus, the vehicle has been transported, shipped or received in interstate and foreign commerce.

17. Based on the information set forth above, I believe there is probable cause to charge TARIK CHAMBERS and NIKEEM LEACH-HILTON with carjacking, in violation of Title 18, United States Code, Section 2119, brandishing a firearm during and in relation to a crime of violence in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii), and aiding and abetting, in violation of Title 18, United States Code, Section 2.

Respectfully submitted,

/s/ Ryan Rooney

Ryan Rooney
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Subscribed and sworn to before me
on March 25th, 2022

/s/ Timothy R. Rice

Honorable Timothy R. Rice
UNITED STATES MAGISTRATE JUDGE